

IN RE:	VITO A. FESLER and	:	CHAPTER 13
	TONI L. FESLER,	:	
	AKA TONI L. CARUCCI,	:	
	Debtors	:	
		:	
	JACK N. ZAHAROPOULOS,	:	
	STANDING CHAPTER 13 TRUSTEE,	:	
	Movant	:	
		:	
	vs.	:	
		:	
	VITO A. FESLER and	:	
	TONI L. FESLER,	:	
	AKA TONI L. CARUCCI,	:	
	Respondents	:	CASE NO. 5:24-bk-03153-MJC

3. The Debtors' Plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, the Debtors have excess non-exempt equity in the following:

- a. Injury or other claim listed on Schedule B.

WHEREFORE, the Trustee alleges and avers that the Debtors' Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtors' Plan;
- b. dismiss or convert the Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 24th day of February 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Timothy B. Fisher, II, Esquire
Fisher and Fisher Law Offices
P.O. Box 396
Gouldsboro, PA 18424

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee